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Attorney for Defendant
MICHAEL LABRECQUE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. Cr-S-03-384 WBS
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO CONTINUE
v.)	STATUS CONFERENCE RE JURY
)	QUESTIONNAIRE
MICHAEL LABRECQUE, et al.)	
)	Date: October 29, 2007
Defendants.)	Time: 8:30 a.m.
)	Judge: Hon. William B. Shubb
_____)	

MICHAEL LABRECQUE, by and through his counsel, Caro Marks, Juliette LaBrecque, by and through her counsel Jan Karowsky, Allan Harrod, by and through his counsel, Bruce Locke, and the United States of America, by and through its counsel, Laurel White, hereby stipulate and agree to continue the hearing presently scheduled for October 15, 2007, for two weeks until October 29, 2007. Counsel for Defendant Labrecque and counsel for the government are currently in trial, and a two-week continuance is necessary is so all counsel can participate in drafting the parties' joint statement regarding the nature of the case to be presented by the Court to the jury, and proposed jury questions

1 to be tendered to the potential jurors by the Court. These two filings
2 were due on October 9, 2007, but due to the parties' trial schedules,
3 the parties were unable to meet and confer on these joint filings.
4 Therefore, the parties stipulate and agree the filings shall be
5 submitted to the Court no later than October 22, 2007. The hearing
6 shall be set for October 29, 2007, at 8:30 a.m..

7 The Court has already excluded time under the Speedy Trial Act
8 from September 10, 2007, until December 11, 2007 (See Docket, #165).
9 Such exclusion shall remain in effect.

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1 All defense counsel and counsel for the government concur in the
2 need for this continuance.

3 Dated: October 10, 2007

4 Respectfully submitted,

5 DANIEL BRODERICK
6 Federal Defender

7 /s/ Caro Marks

8 CARO MARKS
9 Assistant Federal Defender
10 Attorney for Defendant
MICHAEL LABRECQUE

11 /s/ Jan Karowsky

12 JAN KAROWSKY
13 Attorney at Law
Attorney for Defendant
JULIETTE LABRECQUE

14 /s/ Bruce Locke

15 BRUCE LOCKE
16 Attorney at Law
Attorney for Defendant
ALLAN HARROD


18 /S/ Laurel White

19 LAUREL WHITE
20 Assistant United States Attorney

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated: October 12, 2007

24 
25 WILLIAM B. SHUBB
26 UNITED STATES DISTRICT JUDGE
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